

# Exhibit "C"

LAW OFFICES

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Joel S. Isenberg

December 9, 2005

**VIA FACSIMILE AND U.S. MAIL**

Mr. Christopher E. Sanspree  
BEASLEY, ALLEN, CROW, METHVIN  
PORTIS & MILES, P.C.  
Post Office Box 4160  
Montgomery, Alabama 36103

RE: Donald Bell; Katrina Bell v. The Standard Fire Insurance Company  
Our File Number: 18043

Dear Chris:

I am in receipt of your letter dated December 8 regarding Standard Fire's objections to certain of the plaintiffs' interrogatories and requests for production. We will review the objections and be back in touch with you to discuss these in the near future.

In the meantime, please note that the plaintiffs have failed to comply with even the most basic discovery requirements in this case. Pursuant to the Court's Scheduling Order, we mailed to you on October 3, 2005 Standard Fire's initial disclosures, and requested that you send your clients' initial disclosures as soon as possible. To date, we have not received this information from you. Please forward the plaintiffs' initial disclosures immediately.

In addition, on October 4, 2005, we mailed to you Standard Fire's interrogatories and requests for production. Your clients' responses to Standard Fire's discovery requests, and any objections, were due no later than November 7, 2005; however, to date, we have not received them. Accordingly, the plaintiffs' discovery responses are long overdue, and the time for objections has passed. Please forward complete discovery responses within ten business days of this letter so that we can begin to move this case forward.

Mr. Christopher E. Sanspree  
December 9, 2005  
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Sincerely,

SMITH & ELY, LLP

Joel S. Isenberg

JSI/mb

cc: Mr. Brenen G. Ely